

**In the Matter of:**

**Jane Doe**

**v.**

**UVA**

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**Jane Doe**

**June 20, 2024**

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*Casamo*

**Court Reporting  
Videography  
Videoconferencing**

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Jane Doe

1  
6/20/2024

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE WESTERN DISTRICT OF VIRGINIA

3 Charlottesville Division

4 - - - - - X

5 JANE DOE,

6 Plaintiff,

7 -vs-

Case No. 3:23-cv-00018-RSB

8 THE UNIVERSITY OF VIRGINIA,

9 et al.,

10 Defendants.

11 - - - - - X

12 Fairfax, Virginia

13 Thursday, June 20, 2024

14 Deposition of:

15 JANE DOE,

16 the plaintiff, called for examination by counsel on

17 behalf of the defendant, pursuant to notice, taken in

18 THE OFFICE OF THE ATTORNEY GENERAL/FAIRFAX, 10555 Main

19 Street, Suite 350, Fairfax, Virginia, beginning at

20 approximately 10:22 a.m., before Patricia D. Staffa, a

21 Verbatim Reporter and Notary Public in and for the

22 Commonwealth of Virginia at Large, when there were

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1 was a Draft Investigation Report issued to the  
2 parties in August -- it says August 25th, 2020.

3 Is it your position that the Draft  
4 Investigation Report should have been prepared  
5 sooner than August 25th, 2020?

6 A Yeah. As I said, if they had reached  
7 out to witnesses earlier, who they were already  
8 aware of, given that in my first interview I  
9 talk almost strictly about Vienna and Budapest,  
10 yeah, they could have done it earlier.

11 Q So to understand the basis for you  
12 saying that this draft report should have been  
13 done earlier is that you feel that the  
14 investigation should have happened sooner?

15 A Yeah. Could have been quicker.

16 Q And do you agree that that's just your  
17 opinion?

18 A Yeah, it is my opinion.

19 Q Okay. And you don't have any knowledge  
20 about what goes into preparing a Draft  
21 Investigation Report?

22 A I've read the whole thing and I put a

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1 lot of attention into the process when I was  
2 going through it, especially when the final one  
3 came out.

4 Q Uh-huh.

5 A So I'm not an investigator myself, but,  
6 you know, I was part of the process.

7 MR. BERNHARDT: Okay. Ms. Doe, I'm  
8 going to show you what we're going to mark as  
9 Defendant's Exhibit 17.

10 (Whereupon, the document  
11 was marked as Defendant's  
12 Exhibit No. 17, for  
13 identification.)

14 BY MR. BERNHARDT:

15 Q Do you recognize this as being an email  
16 sent by Stuart Evans to you on May 29, 2020?

17 A Uh-huh.

18 Q And this is UVA 005146.

19 Is this a fair and accurate copy of the  
20 email that Stuart Evans sent you on May 29th,  
21 2020?

22 A Yeah.